

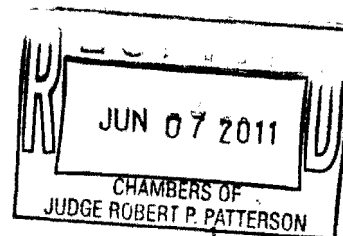
Federal Defenders
OF NEW YORK, INC.

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John J. Byrnes
Acting Executive Director

June 6, 2011

Honorable Robert R. Patterson
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007



Re: United States v. Gerald Roland
11 Cr. 00372 (RPP)

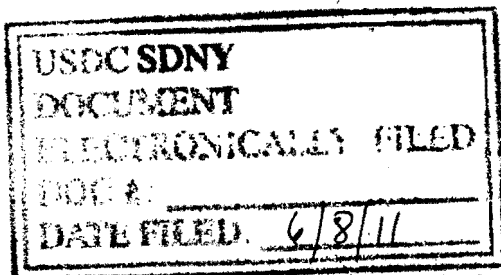
Hon. Judge Patterson:

With consent of the government I write to respectfully request a two week adjournment of the motion schedule in the above-captioned case. Additional discovery has been requested of the government pursuant to Rule 16 of the Federal Rules of Criminal Procedure, but as of the time of this writing these materials have not been received. Specifically, the defense has requested materials and police reports from a New York State Court prosecution of Mr. Roland on the same facts underlying the present federal action. These materials are necessary for counsel and Mr. Roland to determine whether any meritorious motions lie in this case.

Request that defense motions be due on June 20, 2011, the government's answer be due on June 27, 2011, and any hearing be set for June 29, 2011. *cd 4 PM*

As the defendant is engaged in motion practice and is also actively pursuing a disposition, we request that the time between June 6, 2011 and the next court date set by the Court, be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161(h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial, as it will allow the parties to continue plea discussions.

If any additional information is required, I can be reached at (212) 417-8734.



AUSA Jessica Lonergan (via fax)

Respectfully submitted,

Christopher A. Flood
Assistant Federal Defender

*Application granted
See order
(212) 417-8734
U.P.
6/7/11*